

**From:** Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
**To:** Powell, Duncan EPA@SAD; Purify, Johnnie  
**Cc:** Farmer, Carolyn H CIV USARMY CESAJ (US)  
**Subject:** RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 11:46:37 AM  
**Attachments:** [palm beach county 4.png](#)  
[Palm beach county 1.png](#)  
[Palm Beach county 2.png](#)  
[palm beach county 3.png](#)

---

Duncan,

Their mitigation plan wants to claim secondary positive benefits to the parcels owned by Palm Beach County (PBC). But I don't know if we would accept that as lift, as I said previously, the plan has not been fully evaluated. But yes, the secondary enhancement zone B is owned by Palm Beach County. In fact, see all of these screen shots show the lands owned by PBC.

Jerilyn

-----Original Message-----

From: Powell, Duncan [mailto:[Powell.Duncan@epa.gov](mailto:Powell.Duncan@epa.gov)]  
Sent: Friday, February 08, 2019 11:13 AM  
To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Cc: Farmer, Carolyn H CIV USARMY CESAJ (US) <[Carolyn.H.Farmer@usace.army.mil](mailto:Carolyn.H.Farmer@usace.army.mil)>  
Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

Jerilyn,

Excellent, I get it now.

Does the mitigation for this project include the Palm Beach County property to the south in Secondary Enhancement Zone B, as shown on page 34 of 35 of the 20181120\_Mitigation Plan.pdf?

Duncan

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>  
Sent: Friday, February 8, 2019 10:57 AM  
To: Powell, Duncan <[Powell.Duncan@epa.gov](mailto:Powell.Duncan@epa.gov)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Cc: Farmer, Carolyn H CIV USARMY CESAJ (US) <[Carolyn.H.Farmer@usace.army.mil](mailto:Carolyn.H.Farmer@usace.army.mil)>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Duncan,

This is the project area for The Waterfront properties. If you zoom in on p.3, using the property appraiser screen shots, you can see that it is just immediately adjacent and it shows the parcel boundaries as they are in property appraiser.

Jerilyn

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
Sent: Friday, February 08, 2019 10:41 AM  
To: Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Cc: Farmer, Carolyn H CIV USARMY CESAJ (US) <[Carolyn.H.Farmer@usace.army.mil](mailto:Carolyn.H.Farmer@usace.army.mil)>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Good morning Duncan,

Based on the two images from property appraiser it does not appear that the properties overlap, rather immediately adjacent to each other. I have attached three screen shot images. One is from the property appraiser's website for the priest parcel (proposed mitigation for SAJ-2014-00517); a second of the Waterfront Properties Parcel, located immediately adjacent; and a third showing that both parcels are located on lands where it shows the right of way (in orange).

The proposed mitigation area on the priest parcel is within IWWJaxToMiami Tract No.: 12201E and the Waterfront Properties is located within Tract No.: 661.

If you need further clarification, I'm working from home, perhaps a phone call would help. I would be more than happy to call you. I also included Carolyn Farmer in the email, because she is the project manager for the Waterfront Properties parcel.

Jerilyn

-----Original Message-----

From: Powell, Duncan [mailto:Powell.Duncan@epa.gov]

Sent: Friday, February 08, 2019 10:27 AM

To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>

Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

Jerilyn,

Were you able to verify that the two projects had overlapping boundaries?

Duncan

(b) (6)

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>

Sent: Thursday, February 7, 2019 2:36 PM

To: Purify, Johnnie <Purify.Johnnie@epa.gov>

Cc: Powell, Duncan <Powell.Duncan@epa.gov>

Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Sounds great!

Please let me know if you need anything else. I will be here until 4pm today and teleworking again tomorrow, you can reach me by email.

Thanks!

Jerilyn

-----Original Message-----

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]

Sent: Thursday, February 07, 2019 2:35 PM

To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>

Cc: Powell, Duncan EPA@SAD <powell.duncan@epa.gov>

Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

If it worked for Duncan that is good as gold....Thanx!

//JDP//

Johnnie Purify, Commander, USPHS  
U.S. Environmental Protection Agency, Region 4 Acting Chief, Wetlands and Stream Regulatory Section  
Purify.Johnnie@epa.gov  
404-562-9298

"Leadership is what you do with people, not to them."  
~Ken Blanchard

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Thursday, February 7, 2019 2:22 PM  
To: Purify, Johnnie <Purify.Johnnie@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Okay. I am re uploading and sending you a new link. It worked for Duncan. Lets cross our fingers and hope that it works this time. Otherwise I will try a different site.

jerilyn

-----Original Message-----

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]  
Sent: Thursday, February 07, 2019 2:14 PM  
To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Powell, Duncan EPA@SAD <powell.duncan@epa.gov>  
Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

No Ma'am...I get the error message below:

//JDP//

Johnnie Purify, Commander, USPHS  
  
U.S. Environmental Protection Agency, Region 4  
  
Acting Chief, Wetlands and Stream Regulatory Section  
  
Purify.Johnnie@epa.gov  
  
404-562-9298

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~Ken Blanchard

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Thursday, February 7, 2019 12:52 PM  
To: Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Were you able to retrieve the documents?

Jerilyn

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
Sent: Thursday, February 07, 2019 10:30 AM  
To: Purify, Johnnie <Purify.Johnnie@epa.gov <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD  
<[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov) <<mailto:powell.duncan@epa.gov>> >  
Subject: SAJ-2014-00517 Golden City at Highland Beach

Hi Johnnie and Duncan,

I am working on sending the application package that I received via an external website. You will receive an email message from them with a password to access the documents. This is my first time using our new process so please let me know if you have any trouble. Please note the documents have not yet been fully evaluated by the Corps and may be subject to change during the application process.

Included is the following:

Application

Avoidance and Minimization

Complete figures on site

Cumulative impact study

Mitigation Plan

Plans

Public Interest review

UMAM sheets



Data Sheets

I will also try to complete a google earth Overlay of the Waterfront Properties project with this one and show any significant features, such as an easement in my figure. But I will not have time to complete this until this afternoon.

Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

HELP US GO GREEN & SAVE TIME/MONEY! Instead of mailing hardcopies, please send new permit applications to Application-sp@usace.army.mil <<mailto:Application-sp@usace.army.mil>> . FILE OVER 10MB, send an email with subject line: "Request for File Transfer Site Account Access" to: application-sp@usace.army.mil <<mailto:application-sp@usace.army.mil>> . You will receive an email with directions to setup an account.

Please assist us in better serving you! Please complete the customer survey by clicking on the following link:

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<BlockedBlockedBlockedBlocked[http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey)>

**From:** [Ashworth, Jerilyn CIV USARMY CESAJ \(USA\)](#)  
**To:** [Mcgill, Thomas; Zinszer, Shawn H CIV USARMY CESAJ \(US\)](#)  
**Cc:** [White, Tori K CIV USARMY CESAJ \(US\)](#); [Purify, Johnnie](#); [Powell, Duncan EPA@SAD](#); [Zarbo, Alisa A CIV USARMY CESAJ \(US\)](#)  
**Subject:** RE: request for extension for 404(q) review of SAJ-2014-00517  
**Date:** Tuesday, January 29, 2019 10:47:05 AM

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Good morning Thomas,

Thank you for the email. Duncan had also left me a voicemail yesterday afternoon. I had left the office early yesterday, but I returned Duncan's call this morning. The extension for the submission of your (3)(b) letter should not be a problem. Thank you for the email and for notifying me of your conversation. I look forward to receiving the letter.

Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: [Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil) <<mailto:Jerilyn.Ashworth@usace.army.mil>>

HELP US GO GREEN & SAVE TIME/MONEY! Instead of mailing hardcopies, please send new permit applications to [Application-sp@usace.army.mil](mailto:Application-sp@usace.army.mil). FILE OVER 10MB, send an email with subject line: "Request for File Transfer Site Account Access" to: [application-sp@usace.army.mil](mailto:application-sp@usace.army.mil). You will receive an email with directions to setup an account.

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From: McGill, Thomas [mailto:McGill.Thomas@epa.gov]  
Sent: Monday, January 28, 2019 4:49 PM  
To: Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil>  
Cc: White, Tori K CIV USARMY CESAJ (US) <Tori.White@usace.army.mil>; Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan EPA@SAD <powell.duncan@epa.gov>  
Subject: [Non-DoD Source] request for extension for 404(q) review of SAJ-2014-00517

Shawn – I very much appreciate our discussion this afternoon. As we discussed, as a follow-up to the 404(q) letter EPA issued on 12/18/2018 regarding the proposed project for SAJ-2014-00517, we request until 02/15/2019 to complete our review with respect to paragraph IV.3(b) of the Corps-EPA 404(q) MOA. Thank you for your consideration, and please let us know if you have any questions or wish to discuss this. Tom

**From:** Mcgill, Thomas  
**To:** Zinszer, Shawn H CIV USARMY CESAJ (US)  
**Cc:** White, Tori K CIV USARMY CESAJ (US); Ashworth, Jerilyn CIV USARMY CESAJ (USA); Purify, Johnnie; Powell, Duncan EPA@SAD  
**Subject:** [Non-DoD Source] request for extension for 404(q) review of SAJ-2014-00517  
**Date:** Monday, January 28, 2019 4:48:56 PM

---

Shawn – I very much appreciate our discussion this afternoon. As we discussed, as a follow-up to the 404(q) letter EPA issued on 12/18/2018 regarding the proposed project for SAJ-2014-00517, we request until 02/15/2019 to complete our review with respect to paragraph IV.3(b) of the Corps-EPA 404(q) MOA. Thank you for your consideration, and please let us know if you have any questions or wish to discuss this. Tom

**From:** Powell, Duncan  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Purify, Johnnie  
**Cc:** Farmer, Carolyn H CIV USARMY CESAJ (US)  
**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 11:05:01 AM  
**Attachments:** SAJ-2013-03394 Graphics\_8025.pdf

---

Jerilyn,

Please give me a call a (b) (6) so we can discuss this.

I agree that the Waterfront Properties Parcel that they want to fill for three houses is adjacent to the Golden City at Highland Beach compensatory mitigation area. However, the driveway/access road that will connect the Waterfront Properties Parcel to the highway proposes to track through the lots to the south along the western boundaries before turning 90 degrees and heading east to the highway (pages 7 & 8 of Graphics\_8025.pdf). Not only will the driveway fill the proposed mangroves it will cut off the most eastern edge of the proposed mitigation area.

Respectfully,  
Duncan Powell  
Team Lead Senior Life Scientist  
ESA §7 Coordinator  
Office: (404)562-9258  
Mobile: (b) (6)

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Friday, February 8, 2019 10:41 AM  
To: Powell, Duncan <Powell.Duncan@epa.gov>; Purify, Johnnie <Purify.Johnnie@epa.gov>  
Cc: Farmer, Carolyn H CIV USARMY CESAJ (US) <Carolyn.H.Farmer@usace.army.mil>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

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If you need further clarification, I'm working from home, perhaps a phone call would help. I would be more than happy to call you. I also included Carolyn Farmer in the email, because she is the project manager for the Waterfront Properties parcel.

Jerilyn

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To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>  
Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

Jerilyn,

Were you able to verify that the two projects had overlapping boundaries?

Duncan

(b) (6)

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To: Purify, Johnnie <Purify.Johnnie@epa.gov>  
Cc: Powell, Duncan <Powell.Duncan@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Sounds great!

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Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

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//JDP//

Johnnie Purify, Commander, USPHS  
U.S. Environmental Protection Agency, Region 4 Acting Chief, Wetlands and Stream Regulatory Section  
Purify.Johnnie@epa.gov  
404-562-9298

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Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

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//JDP//

Johnnie Purify, Commander, USPHS

U.S. Environmental Protection Agency, Region 4

Acting Chief, Wetlands and Stream Regulatory Section

Purify.Johnnie@epa.gov

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Sent: Thursday, February 7, 2019 12:52 PM

To: Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>

Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

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Sent: Thursday, February 07, 2019 10:30 AM

To: Purify, Johnnie <Purify.Johnnie@epa.gov <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov) <<mailto:powell.duncan@epa.gov>> >

Subject: SAJ-2014-00517 Golden City at Highland Beach

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Included is the following:

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Avoidance and Minimization

Complete figures on site

Cumulative impact study

Mitigation Plan

Plans

Public Interest review

UMAM sheets

Data Sheets

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Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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Please assist us in better serving you! Please complete the customer survey by clicking on the following link:

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<BlockedBlockedBlockedBlocked[http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey)>

**From:** Zarbo, Alisa A CIV USARMY CESAJ (US)  
**To:** Zinszer, Shawn H CIV USARMY CESAJ (US); White, Tori K CIV USARMY CESAJ (US); Fellows, John P CIV USARMY CESAJ (USA)  
**Cc:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Farmer, Carolyn H CIV USARMY CESAJ (US)  
**Subject:** RE: request for extension for 404(q) review of SAJ-2014-00517 (UNCLASSIFIED)  
**Date:** Thursday, February 07, 2019 10:25:35 AM

---

CLASSIFICATION: UNCLASSIFIED

Good morning. This morning Jerilyn and I met with Duncan, Johnnie, and Thomas of EPA to go over the two mangrove projects in PB County. There were questions on the location of each project. Although we clarified, I will confirm with them the location of each parcel since Carolyn was not on the call. EPA asked about working with the applicant before sending a potential 3b letter, but with only 30 days between letters, there is not enough time to iron out any concerns. They thought if they reviewed more information, it may suffice. We agreed to provide EPA with the entire application for Jerilyn's 2014-00517 (Golden City) project.

Next steps: Public notice closed for Golden City on January 4. We are gathering comments/concerns and will send the applicant a RAI to address concerns. For Carolyn's 2013-03394 (Swaim) project, EPA already sent 3a/3b letters. We drafted a bad news letter, which is in my review.

We'll keep you all updated on these two projects. Let me know if you have any questions. Thank you -Alisa

-----Original Message-----

**From:** McGill, Thomas [mailto:McGill.Thomas@epa.gov]  
**Sent:** Wednesday, February 6, 2019 5:29 PM  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil>  
**Cc:** White, Tori K CIV USARMY CESAJ (US) <Tori.White@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan EPA@SAD <powell.duncan@epa.gov>; Zarbo, Alisa A CIV USARMY CESAJ (US) <Alisa.A.Zarbo@usace.army.mil>  
**Subject:** [Non-DoD Source] RE: request for extension for 404(q) review of SAJ-2014-00517

Jerilyn, Shawn, Tori, Alisa - In EPA's 12/18/18 letter regarding this project (attached), we identified the need for clarification regarding the proposed mitigation, as it appeared to be similar to property being proposed for the discharge of material in a separate public notice (SAJ-2013-03394). Unfortunately Duncan Powell (EPA's lead on this) has been out or (b) (6), and I'm not sure whether there is any clarification or updates that you or the applicant may have provided him. If not, do any of you have any new information on this or suggestions of how/whether we could quickly nail this down? If it would be helpful for us to discuss, can any of you be available tomorrow before 11:00 am? Thanks! Tom

**From:** McGill, Thomas  
**Sent:** Tuesday, January 29, 2019 12:07 PM  
**To:** 'Ashworth, Jerilyn CIV USARMY CESAJ (USA)' <Jerilyn.Ashworth@usace.army.mil>; Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil>  
**Cc:** White, Tori K CIV USARMY CESAJ (US) <Tori.White@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>; Zarbo, Alisa A CIV USARMY CESAJ (US) <Alisa.A.Zarbo@usace.army.mil>  
**Subject:** RE: request for extension for 404(q) review of SAJ-2014-00517

Thank you very much Jerilyn.

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil  
<<mailto:Jerilyn.Ashworth@usace.army.mil>> >  
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To: McGill, Thomas <McGill.Thomas@epa.gov <<mailto:McGill.Thomas@epa.gov>> >; Zinszer, Shawn H CIV  
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<<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan <Powell.Duncan@epa.gov  
<<mailto:Powell.Duncan@epa.gov>> >; Zarbo, Alisa A CIV USARMY CESAJ (US)  
<Alisa.A.Zarbo@usace.army.mil <<mailto:Alisa.A.Zarbo@usace.army.mil>> >  
Subject: RE: request for extension for 404(q) review of SAJ-2014-00517

Good morning Thomas,

Thank you for the email. Duncan had also left me a voicemail yesterday afternoon. I had left the office early yesterday, but I returned Duncan's call this morning. The extension for the submission of your (3)(b) letter should not be a problem. Thank you for the email and for notifying me of your conversation. I look forward to receiving the letter.

Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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From: McGill, Thomas [<mailto:McGill.Thomas@epa.gov>]  
Sent: Monday, January 28, 2019 4:49 PM  
To: Zinszer, Shawn H CIV USARMY CESAJ (US) <[Shawn.H.Zinszer@usace.army.mil](mailto:Shawn.H.Zinszer@usace.army.mil)>  
<<mailto:Shawn.H.Zinszer@usace.army.mil>> >  
Cc: White, Tori K CIV USARMY CESAJ (US) <[Tori.White@usace.army.mil](mailto:Tori.White@usace.army.mil)>  
<<mailto:Tori.White@usace.army.mil>> >; Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
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<[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)> <<mailto:powell.duncan@epa.gov>> >  
Subject: [Non-DoD Source] request for extension for 404(q) review of SAJ-2014-00517

Shawn – I very much appreciate our discussion this afternoon. As we discussed, as a follow-up to the 404(q) letter EPA issued on 12/18/2018 regarding the proposed project for SAJ-2014-00517, we request until 02/15/2019 to complete our review with respect to paragraph IV.3(b) of the Corps-EPA 404(q) MOA. Thank you for your consideration, and please let us know if you have any questions or wish to discuss this. Tom

CLASSIFICATION: UNCLASSIFIED



**From:** [Ashworth, Jerilyn CIV USARMY CESAJ \(USA\)](#)  
**To:** [Powell, Duncan EPA@SAD](#); [Purify, Johnnie](#)  
**Cc:** [Farmer, Carolyn H CIV USARMY CESAJ \(US\)](#)  
**Subject:** RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 10:41:27 AM  
**Attachments:** [Corps Real estate easement mitigation Area.png](#)  
[Priest Mitigation Parcel.png](#)  
[Waterfront Properties LLC-swain parcel.png](#)

---

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If you need further clarification, I'm working from home, perhaps a phone call would help. I would be more than happy to call you. I also included Carolyn Farmer in the email, because she is the project manager for the Waterfront Properties parcel.

Jerilyn

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Sent: Friday, February 08, 2019 10:27 AM  
To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

Jerilyn,

Were you able to verify that the two projects had overlapping boundaries?

Duncan

(b) (6)

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From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>  
Sent: Thursday, February 7, 2019 2:36 PM  
To: Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Cc: Powell, Duncan <[Powell.Duncan@epa.gov](mailto:Powell.Duncan@epa.gov)>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

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Please let me know if you need anything else. I will be here until 4pm today and teleworking again tomorrow, you can reach me by email.

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If it worked for Duncan that is good as gold....Thanx!

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Johnnie Purify, Commander, USPHS  
U.S. Environmental Protection Agency, Region 4 Acting Chief, Wetlands and Stream Regulatory Section  
Purify.Johnnie@epa.gov  
404-562-9298

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Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

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Hi Johnnie and Duncan,

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Included is the following:

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Avoidance and Minimization

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Cumulative impact study

Mitigation Plan

Plans

Public Interest review

UMAM sheets

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**From:** Powell, Duncan  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Purify, Johnnie  
**Cc:** Farmer, Carolyn H CIV USARMY CESAJ (US)  
**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 11:28:20 AM  
**Attachments:** 20181120-Mitigation Plan.pdf

---

Jerilyn,

Excellent, I get it now.

Does the mitigation for this project include the Palm Beach County property to the south in Secondary Enhancement Zone B, as shown on page 34 of 35 of the 20181120\_Mitigation Plan.pdf?

Duncan

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Friday, February 8, 2019 10:57 AM  
To: Powell, Duncan <Powell.Duncan@epa.gov>; Purify, Johnnie <Purify.Johnnie@epa.gov>  
Cc: Farmer, Carolyn H CIV USARMY CESAJ (US) <Carolyn.H.Farmer@usace.army.mil>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Duncan,

This is the project area for The Waterfront properties. If you zoom in on p.3, using the property appraiser screen shots, you can see that it is just immediately adjacent and it shows the parcel boundaries as they are in property appraiser.

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(b) (6)

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To: Purify, Johnnie <Purify.Johnnie@epa.gov>  
Cc: Powell, Duncan <Powell.Duncan@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Sounds great!

Please let me know if you need anything else. I will be here until 4pm today and teleworking again tomorrow, you can reach me by email.

Thanks!

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If it worked for Duncan that is good....Thanx!

//JDP//

Johnnie Purify, Commander, USPHS  
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//JDP//

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**Attachments:** [20181120-Mitigation Plan.pdf](#)

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Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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**From:** [Ashworth, Jerilyn CIV USARMY CESAJ \(USA\)](#)  
**To:** [Powell, Duncan EPA@SAD](#); [Purify, Johnnie](#)  
**Cc:** [Farmer, Carolyn H CIV USARMY CESAJ \(US\)](#)  
**Subject:** RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 10:41:27 AM  
**Attachments:** [Corps Real estate easement mitigation Area.png](#)  
[Priest Mitigation Parcel.png](#)  
[Waterfront Properties LLC-swain parcel.png](#)

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Duncan

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**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 11:28:20 AM  
**Attachments:** [20181120-Mitigation Plan.pdf](#)

---

Jerilyn,

Excellent, I get it now.

Does the mitigation for this project include the Palm Beach County property to the south in Secondary Enhancement Zone B, as shown on page 34 of 35 of the 20181120\_Mitigation Plan.pdf?

Duncan

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Sent: Friday, February 8, 2019 10:57 AM  
To: Powell, Duncan <[Powell.Duncan@epa.gov](mailto:Powell.Duncan@epa.gov)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
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**Attachments:** Waterfront Properties Project area.pdf

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701 San Marco Blvd.

Jacksonville, FL 32207-8175

ph: 904-232-2477

fax: 904-232-3692

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From: Mary McKinney [<mailto:mmckinney@highlandbeach.us>]  
Sent: Friday, February 22, 2019 11:45 AM  
To: FOIA-SAJ <[FOIA-SAJ@usace.army.mil](mailto:FOIA-SAJ@usace.army.mil)> <<mailto:FOIA-SAJ@usace.army.mil>> >  
Subject: [Non-DoD Source] FOIA

My name is Mary McKinney. I am the Town Planner for the Town of Highland Beach, Florida. We are requesting copies of correspondence and files pertaining to Permit Application Number SAJ-2014-00517(SP-JKA), Applicant Golden City Highland Beach, LLC.

My phone number is 561-637-2012 and our address is 3614 South Ocean Boulevard, Highland Beach, FL 33487.

Thank you very much.

**From:** Purify, Johnnie  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Powell, Duncan EPA@SAD  
**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Thursday, February 07, 2019 2:17:31 PM

---

No Ma'am...I get the error message below:

//JDP//

Johnnie Purify, Commander, USPHS

U.S. Environmental Protection Agency, Region 4

Acting Chief, Wetlands and Stream Regulatory Section

Purify.Johnnie@epa.gov

404-562-9298

"Leadership is what you do with people, not to them."

~Ken Blanchard

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>

Sent: Thursday, February 7, 2019 12:52 PM

To: Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>

Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Were you able to retrieve the documents?

Jerilyn

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA)

Sent: Thursday, February 07, 2019 10:30 AM

To: Purify, Johnnie <Purify.Johnnie@epa.gov <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)<<mailto:powell.duncan@epa.gov>> >

Subject: SAJ-2014-00517 Golden City at Highland Beach

Hi Johnnie and Duncan,

I am working on sending the application package that I received via an external website. You will receive an email message from them with a password to access the documents. This is my first time using our new process so please let me know if you have any trouble. Please note the documents have not yet been fully evaluated by the Corps and may be subject to change during the application process.

Included is the following:

Application

Avoidance and Minimization

Complete figures on site

Cumulative impact study

Mitigation Plan

Plans

Public Interest review

UMAM sheets

Data Sheets

I will also try to complete a google earth Overlay of the Waterfront Properties project with this one and show any significant features, such as an easement in my figure. But I will not have time to complete this until this afternoon.

Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

HELP US GO GREEN & SAVE TIME/MONEY! Instead of mailing hardcopies, please send new permit applications to Application-sp@usace.army.mil <<mailto:Application-sp@usace.army.mil>> . FILE OVER 10MB, send an email with subject line: "Request for File Transfer Site Account Access" to: application-sp@usace.army.mil <<mailto:application-sp@usace.army.mil>> . You will receive an email with directions to setup an account.

Please assist us in better serving you! Please complete the customer survey by clicking on the following link:

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<Blocked[http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey)>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

RECEIVED

JAN 07 2018

DEC 18 2018

PALETTES: BIDDING, REGULATORY OFFICE  
AND DISTRICT, USAGE

Colonel Andrew Kelly  
District Engineer  
Department of the Army  
Jacksonville District Corps of Engineers  
ATTN: Jerilyn Ashworth  
4400 PGA Boulevard, Suite 500  
Palm Beach Gardens, Florida 33410

Subject: SAJ-2014-00517 Golden City Highland Beach, LLC

Dear Colonel Kelly:

This letter is in response to permit application number SAJ-2014-00517 (SP-JKA) submitted by Golden City Highland Beach, LLC (Applicant) and follows the procedures outlined in the 1992 Memorandum of Agreement between the U.S. Environmental Protection Agency and the Department of Army, Part IV, Elevation of Individual Permits (MOA), paragraph 3(a), regarding Section 404(q) of the Clean Water Act (CWA). The project is located at 3822 South Ocean Boulevard, Section 4, Township 47 South, Range 43 East, Highland Beach, Palm Beach County, Florida. Based on the information in the public notice, we understand the Applicant proposes to fill 2.36 acres of a 5.15-acre tidal mangrove wetland to construct a multi-family residential community. The EPA has completed its review based on the available information contained in the public notice and site imagery from Google Earth Pro (as viewed on December 11, 2018), in consideration of the CWA Section 404(b)(1) Guidelines (Guidelines) set forth at 40 CFR Part 230.

The proposed non-water dependent project will have direct impact on 2.36 acres of estuarine mangrove forested wetlands from the discharge of fill material. The EPA considers mangroves to be aquatic resources of national importance (ARNI) because they are essential to the region in providing marine habitat, storm protection, and water quality improvement, and the cumulative loss of such habitat has reduced local water quality. Mangrove wetlands located within the southeast Florida form a vital component of estuarine and marine environment, providing a major organic detrital base to the aquatic food chains, significant habitat for arboreal, intertidal and subtidal organisms, nesting sites, cover, and foraging grounds for birds, and habitat for reptiles and mammals. Mangroves also provide protected nursery areas for fishes, crustaceans, and shellfish, and they serve as storm buffers by functioning as wind breaks and baffling wave action. Further, mangroves improve water quality and clarity by filtering upland runoff and trapping waterborne sediments and debris, and mangrove roots stabilize shorelines and fine substrates, reducing turbidity and enhancing water clarity.



The Guidelines at 40 CFR Section 230.10(a) state that no discharge of dredged and/or fill material into waters of the United States, including wetlands, shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic environment, provided the alternative does not have other significant adverse environmental consequences. Practicable alternatives are those that are "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." This regulation further states that for non-water dependent projects, practicable alternatives that do not involve special aquatic sites are presumed to be available. In consideration that a multi-family residential community is not water dependent, the EPA requests that the Applicant provide additional information that demonstrates the consideration of alternatives that would not impact tidal wetlands and estuaries.

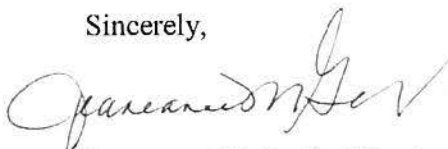
The Guidelines at 40 CFR Part 230 subpart J state that the fundamental objective of compensatory mitigation is to offset environmental losses resulting from unavoidable impacts to waters of the United States authorized by the U.S. Army Corps of Engineers. The EPA needs information about the alternatives considered by the Applicant, as requested above, to understand whether any of the proposed impacts are unavoidable. We also need additional information to understand whether the other requirements of 40 CFR Part 230 subpart J regarding compensatory mitigation have been addressed. Specifically, we request that the Applicant provide Uniform Mitigation Assessment Method (UMAM) scores for the proposed impact and mitigation sites associated with the proposed project, including the technical rationale for each UMAM score. There is need for clarification because one of the mitigation sites appears to be similar to property being proposed for the discharge of dredged and/or fill material in a recent public notice (SAJ-2013-03394).

Based on our review to date, the EPA finds this project as proposed may have substantial and unacceptable adverse impacts on project area estuarine mangrove wetlands that are ARNI. The EPA looks forward to receiving the information requested above to facilitate our further evaluation of this project.

In addition, for future proposed projects that impact unique and valuable aquatic resources such as mangrove wetlands, we continue to believe there may be opportunities to identify and work through potential issues during the pre-application phase of the project. We greatly appreciate the discussion held between my staff and your office on December 11, 2018, regarding this matter. The EPA looks forward to participating in these pre-application discussions with your office and/or the project applicants where such opportunities exist and expect that our early involvement may lead to a greater level of efficiency in the permitting process.

If you have any questions or wish to discuss any of the contents of this letter, please feel free to contact me or have someone from your staff contact my technical staff representative, Mr. Duncan Powell at (404) 562-9258 or [powell.duncan@epa.gov](mailto:powell.duncan@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeaneanne M. Gettle", is written over a faint, larger version of the same signature.

Jeaneanne M. Gettle, Director  
Water Protection Division

**From:** McGill, Thomas  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Zinszer, Shawn H CIV USARMY CESAJ (US)  
**Cc:** White, Tori K CIV USARMY CESAJ (US); Purify, Johnnie; Powell, Duncan EPA@SAD; Zarbo, Alisa A CIV USARMY CESAJ (US)  
**Subject:** [Non-DoD Source] RE: request for extension for 404(q) review of SAJ-2014-00517  
**Date:** Tuesday, January 29, 2019 12:07:04 PM

---

Thank you very much Jerilyn.

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Tuesday, January 29, 2019 10:47 AM  
To: McGill, Thomas <McGill.Thomas@epa.gov>; Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil>  
Cc: White, Tori K CIV USARMY CESAJ (US) <Tori.White@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>; Zarbo, Alisa A CIV USARMY CESAJ (US) <Alisa.A.Zarbo@usace.army.mil>  
Subject: RE: request for extension for 404(q) review of SAJ-2014-00517

Good morning Thomas,

Thank you for the email. Duncan had also left me a voicemail yesterday afternoon. I had left the office early yesterday, but I returned Duncan's call this morning. The extension for the submission of your (3)(b) letter should not be a problem. Thank you for the email and for notifying me of your conversation. I look forward to receiving the letter.

Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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Please assist us in better serving you! Please complete the customer survey by clicking on the following link:

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From: McGill, Thomas [<mailto:McGill.Thomas@epa.gov>]  
Sent: Monday, January 28, 2019 4:49 PM  
To: Zinszer, Shawn H CIV USARMY CESAJ (US) <[Shawn.H.Zinszer@usace.army.mil](mailto:Shawn.H.Zinszer@usace.army.mil)>  
<<mailto:Shawn.H.Zinszer@usace.army.mil>> >  
Cc: White, Tori K CIV USARMY CESAJ (US) <[Tori.White@usace.army.mil](mailto:Tori.White@usace.army.mil)>  
<<mailto:Tori.White@usace.army.mil>> >; Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
<[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)> <<mailto:Jerilyn.Ashworth@usace.army.mil>> >; Purify, Johnnie  
<[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)> <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD  
<[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)> <<mailto:powell.duncan@epa.gov>> >  
Subject: [Non-DoD Source] request for extension for 404(q) review of SAJ-2014-00517

Shawn – I very much appreciate our discussion this afternoon. As we discussed, as a follow-up to the 404(q) letter EPA issued on 12/18/2018 regarding the proposed project for SAJ-2014-00517, we request until 02/15/2019 to complete our review with respect to paragraph IV.3(b) of the Corps-EPA 404(q) MOA. Thank you for your consideration, and please let us know if you have any questions or wish to discuss this. Tom

**From:** [Powell, Duncan](#)  
**To:** [Ashworth, Jerilyn CIV USARMY CESAJ \(USA\)](#); [Purify, Johnnie](#)  
**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Thursday, February 07, 2019 2:16:49 PM

---

Jerilyn,

Yes, thank you very much I was able to access the information very easily.

Duncan

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>  
Sent: Thursday, February 7, 2019 12:52 PM  
To: Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>; Powell, Duncan <[Powell.Duncan@epa.gov](mailto:Powell.Duncan@epa.gov)>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Were you able to retrieve the documents?

Jerilyn

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From: Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
Sent: Thursday, February 07, 2019 10:30 AM  
To: Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>; Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)>  
Subject: SAJ-2014-00517 Golden City at Highland Beach

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Sincerely,

Jerilyn Ashworth  
Project Manager  
U.S. Army Corps of Engineers  
4400 PGA Boulevard, Suite 500  
Palm Beach Gardens, Florida 33410  
Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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JAN 07 2018

DEC 18 2018

FEDERAL REGION 4 ADMINISTRATIVE OFFICE  
JAN 07 2018, 10:00 AM

Colonel Andrew Kelly  
District Engineer  
Department of the Army  
Jacksonville District Corps of Engineers  
ATTN: Jerilyn Ashworth  
4400 PGA Boulevard, Suite 500  
Palm Beach Gardens, Florida 33410

Subject: SAJ-2014-00517 Golden City Highland Beach, LLC

Dear Colonel Kelly:

This letter is in response to permit application number SAJ-2014-00517 (SP-JKA) submitted by Golden City Highland Beach, LLC (Applicant) and follows the procedures outlined in the 1992 Memorandum of Agreement between the U.S. Environmental Protection Agency and the Department of Army, Part IV, Elevation of Individual Permits (MOA), paragraph 3(a), regarding Section 404(q) of the Clean Water Act (CWA). The project is located at 3822 South Ocean Boulevard, Section 4, Township 47 South, Range 43 East, Highland Beach, Palm Beach County, Florida. Based on the information in the public notice, we understand the Applicant proposes to fill 2.36 acres of a 5.15-acre tidal mangrove wetland to construct a multi-family residential community. The EPA has completed its review based on the available information contained in the public notice and site imagery from Google Earth Pro (as viewed on December 11, 2018), in consideration of the CWA Section 404(b)(1) Guidelines (Guidelines) set forth at 40 CFR Part 230.

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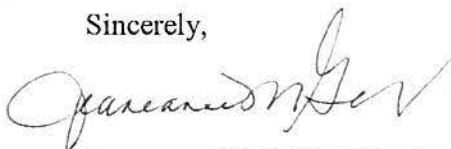
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If you have any questions or wish to discuss any of the contents of this letter, please feel free to contact me or have someone from your staff contact my technical staff representative, Mr. Duncan Powell at (404) 562-9258 or [powell.duncan@epa.gov](mailto:powell.duncan@epa.gov).

Sincerely,



Jeaneanne M. Gettle, Director  
Water Protection Division



**From:** McGill, Thomas  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Zinszer, Shawn H CIV USARMY CESAJ (US)  
**Cc:** White, Tori K CIV USARMY CESAJ (US); Purify, Johnnie; Powell, Duncan EPA@SAD; Zarbo, Alisa A CIV USARMY CESAJ (US)  
**Subject:** [Non-DoD Source] RE: request for extension for 404(q) review of SAJ-2014-00517  
**Date:** Wednesday, February 06, 2019 5:31:51 PM  
**Attachments:** 12182018 Col Andrew Kelly Golden City Highland Beach A ltr SAJ-2014-00517.pdf

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Jerilyn, Shawn, Tori, Alisa - In EPA's 12/18/18 letter regarding this project (attached), we identified the need for clarification regarding the proposed mitigation, as it appeared to be similar to property being proposed for the discharge of material in a separate public notice (SAJ-2013-03394). Unfortunately Duncan Powell (EPA's lead on this) has been out or (b) (6) , and I'm not sure whether there is any clarification or updates that you or the applicant may have provided him. If not, do any of you have any new information on this or suggestions of how/whether we could quickly nail this down? If it would be helpful for us to discuss, can any of you be available tomorrow before 11:00 am? Thanks! Tom

From: McGill, Thomas  
Sent: Tuesday, January 29, 2019 12:07 PM  
To: 'Ashworth, Jerilyn CIV USARMY CESAJ (USA)' <Jerilyn.Ashworth@usace.army.mil>; Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil>  
Cc: White, Tori K CIV USARMY CESAJ (US) <Tori.White@usace.army.mil>; Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>; Zarbo, Alisa A CIV USARMY CESAJ (US) <Alisa.A.Zarbo@usace.army.mil>  
Subject: RE: request for extension for 404(q) review of SAJ-2014-00517

Thank you very much Jerilyn.

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil  
<mailto:Jerilyn.Ashworth@usace.army.mil> >  
Sent: Tuesday, January 29, 2019 10:47 AM  
To: McGill, Thomas <McGill.Thomas@epa.gov <mailto:McGill.Thomas@epa.gov> >; Zinszer, Shawn H CIV USARMY CESAJ (US) <Shawn.H.Zinszer@usace.army.mil <mailto:Shawn.H.Zinszer@usace.army.mil> >  
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Subject: RE: request for extension for 404(q) review of SAJ-2014-00517

Good morning Thomas,

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Sincerely,

Jerilyn Ashworth

Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: [Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil) <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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Sent: Monday, January 28, 2019 4:49 PM  
To: Zinszer, Shawn H CIV USARMY CESAJ (US) <[Shawn.H.Zinszer@usace.army.mil](mailto:Shawn.H.Zinszer@usace.army.mil)>  
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<<mailto:Tori.White@usace.army.mil>> >; Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
<[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)> <<mailto:Jerilyn.Ashworth@usace.army.mil>> >; Purify, Johnnie

<Purify.Johnnie@epa.gov <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD  
<powell.duncan@epa.gov <<mailto:powell.duncan@epa.gov>> >  
Subject: [Non-DoD Source] request for extension for 404(q) review of SAJ-2014-00517

Shawn – I very much appreciate our discussion this afternoon. As we discussed, as a follow-up to the 404(q) letter EPA issued on 12/18/2018 regarding the proposed project for SAJ-2014-00517, we request until 02/15/2019 to complete our review with respect to paragraph IV.3(b) of the Corps-EPA 404(q) MOA. Thank you for your consideration, and please let us know if you have any questions or wish to discuss this. Tom

**From:** Powell, Duncan  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA)  
**Subject:** [Non-DoD Source] RE: NMFS HCD Comments: SAJ-2014-00517  
**Date:** Thursday, February 21, 2019 7:57:18 AM

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Good morning Jerilyn,

Thank you for your very timely response to my request!

Respectfully,

Duncan Powell  
Team Lead Senior Life Scientist  
ESA §7 Coordinator  
Office: (404)562-9258  
Mobile: (b) (6)

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Thursday, February 21, 2019 7:46 AM  
To: Powell, Duncan <Powell.Duncan@epa.gov>  
Subject: NMFS HCD Comments: SAJ-2014-00517

Hi good morning Duncan,

I did not receive your voicemail until this morning. I have not yet coordinated with NMFS-PRD on the proposed project, however I did receive comments from NMFS-HCD on the impact to EFH. Please see the attached letter per your request.

Please let me know if I can be of any further help. I have been teleworking on Monday and Friday, if you need to reach me, my google voice number is below in my signature block.

Thank you,

Jerilyn Ashworth  
Project Manager  
U.S. Army Corps of Engineers  
4400 PGA Boulevard, Suite 500  
Palm Beach Gardens, Florida 33410  
Phone: 561-472-3508  
Email: Jerilyn.Ashworth@usace.army.mil

Telework Days: Wednesday and Friday;  
Telework Phone: 561-412-5449

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**From:** [Ashworth, Jerilyn CIV USARMY CESAJ \(USA\)](#)  
**To:** [Mcgill, Thomas](#)  
**Cc:** [Powell, Duncan EPA@SAD](#); [Purify, Johnnie](#); [Zarbo, Alisa A CIV USARMY CESAJ \(US\)](#)  
**Subject:** RE: clarification re: mitigation plan for SAJ-2014-00517  
**Date:** Monday, February 11, 2019 8:07:06 AM  
**Attachments:** [Palm Beach county 2.png](#)  
[palm beach county 3.png](#)  
[palm beach county 4.png](#)  
[20190211-Waterfront properties and Zone B.PDF](#)

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Hi Tom,

The second sentence is not accurate. Please see the attached scanned drawing (PDF) where I outlined the waterfront properties in black (sorry I didn't have a better color). I also included screen shots of the Palm Beach County Lands. All of the Secondary enhancement areas (Both zones B and C) are owned by Palm Beach County.

It is more accurate to say something: "The mangroves along the eastern boundary of the Direct Enhancement Zone A are subject to proposed discharges of dredge/fill material from a separate Section 404 project (SAJ-2013-03396, Waterfront ICW LLC)."

I will be in the office all day as will Alisa Zarbo, if you need further clarification.

Jerilyn

-----Original Message-----

From: McGill, Thomas [<mailto:Mcgill.Thomas@epa.gov>]  
Sent: Friday, February 08, 2019 5:52 PM  
To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <[Jerilyn.Ashworth@usace.army.mil](mailto:Jerilyn.Ashworth@usace.army.mil)>  
Cc: Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov)>; Purify, Johnnie <[Purify.Johnnie@epa.gov](mailto:Purify.Johnnie@epa.gov)>  
Subject: [Non-DoD Source] clarification re: mitigation plan for SAJ-2014-00517

Jerilyn – I would appreciate your feedback regarding the accuracy of the second sentence below, which is based on my understanding of the relationship between the proposed Golden City Highland Beach project and the ICW Waterfront project. There may be a better way to word it, but I'm primarily interested in knowing whether it's accurate. Thanks. Tom

The EPA appreciates the additional information provided by the Corps on February 7, 2019, regarding the Applicant's compensatory mitigation plan, which includes proposed direct enhancements and secondary enhancements to aquatic resources in certain areas in Palm Beach County, Florida. Based on our review and communication with your office, we understand that a portion of the area proposed to receive secondary enhancements (i.e., ZONE B) potentially will also be subject to proposed discharges of dredge/fill material from a separate Section 404 project (SAJ-2013-03396, Waterfront ICW LLC).



**From:** Powell, Duncan  
**To:** Ashworth, Jerilyn CIV USARMY CESAJ (USA); Purify, Johnnie  
**Subject:** [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach  
**Date:** Friday, February 08, 2019 10:27:08 AM

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Jerilyn,

Were you able to verify that the two projects had overlapping boundaries?

Duncan

(b) (6)

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Thursday, February 7, 2019 2:36 PM  
To: Purify, Johnnie <Purify.Johnnie@epa.gov>  
Cc: Powell, Duncan <Powell.Duncan@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Sounds great!

Please let me know if you need anything else. I will be here until 4pm today and teleworking again tomorrow, you can reach me by email.

Thanks!

Jerilyn

-----Original Message-----

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]  
Sent: Thursday, February 07, 2019 2:35 PM  
To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Cc: Powell, Duncan EPA@SAD <powell.duncan@epa.gov>  
Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

If it worked for Duncan that is good....Thanx!

//JDP//

Johnnie Purify, Commander, USPHS  
U.S. Environmental Protection Agency, Region 4 Acting Chief, Wetlands and Stream Regulatory Section  
Purify.Johnnie@epa.gov  
404-562-9298

"Leadership is what you do with people, not to them."  
~Ken Blanchard

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>  
Sent: Thursday, February 7, 2019 2:22 PM  
To: Purify, Johnnie <Purify.Johnnie@epa.gov>  
Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Okay. I am re uploading and sending you a new link. It worked for Duncan. Lets cross our fingers and hope that it

works this time. Otherwise I will try a different site.

jerilyn

-----Original Message-----

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]

Sent: Thursday, February 07, 2019 2:14 PM

To: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>; Powell, Duncan EPA@SAD <powell.duncan@epa.gov>

Subject: [Non-DoD Source] RE: SAJ-2014-00517 Golden City at Highland Beach

No Ma'am...I get the error message below:

//JDP//

Johnnie Purify, Commander, USPHS

U.S. Environmental Protection Agency, Region 4

Acting Chief, Wetlands and Stream Regulatory Section

Purify.Johnnie@epa.gov

404-562-9298

"Leadership is what you do with people, not to them."

~Ken Blanchard

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA) <Jerilyn.Ashworth@usace.army.mil>

Sent: Thursday, February 7, 2019 12:52 PM

To: Purify, Johnnie <Purify.Johnnie@epa.gov>; Powell, Duncan <Powell.Duncan@epa.gov>

Subject: RE: SAJ-2014-00517 Golden City at Highland Beach

Were you able to retrieve the documents?

Jerilyn

-----Original Message-----

From: Ashworth, Jerilyn CIV USARMY CESAJ (USA)

Sent: Thursday, February 07, 2019 10:30 AM

To: Purify, Johnnie <Purify.Johnnie@epa.gov <<mailto:Purify.Johnnie@epa.gov>> >; Powell, Duncan EPA@SAD <[powell.duncan@epa.gov](mailto:powell.duncan@epa.gov) <<mailto:powell.duncan@epa.gov>> >

Subject: SAJ-2014-00517 Golden City at Highland Beach

Hi Johnnie and Duncan,

I am working on sending the application package that I received via an external website. You will receive an email message from them with a password to access the documents. This is my first time using our new process so please let me know if you have any trouble. Please note the documents have not yet been fully evaluated by the Corps and may be subject to change during the application process.

Included is the following:

Application

Avoidance and Minimization

Complete figures on site

Cumulative impact study

Mitigation Plan

Plans

Public Interest review

UMAM sheets

Data Sheets

I will also try to complete a google earth Overlay of the Waterfront Properties project with this one and show any significant features, such as an easement in my figure. But I will not have time to complete this until this afternoon.

Sincerely,

Jerilyn Ashworth



Project Manager

U.S. Army Corps of Engineers

4400 PGA Boulevard, Suite 500

Palm Beach Gardens, Florida 33410

Phone: 561-472-3508

Email: Jerilyn.Ashworth@usace.army.mil <<mailto:Jerilyn.Ashworth@usace.army.mil>>

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